

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA (Reading)**

In Re: :
HECTOR DIAZ, : **Bankruptcy No. 23-10803-pmm**
Debtor : **Chapter 13**
Freedom Mortgage Corporation :
Movant :
 :
 :
v. :
HECTOR DIAZ : **11 U.S.C. §362**

and
SCOTT F. WATERMAN (Chapter 13), ESQUIRE
(TRUSTEE)

Respondent(s) :

**CERTIFICATION OF NO ANSWER REGARDING FREEDOM MORTGAGE CORPORATION'S
MOTION FOR RELIEF FROM STAY (DE 32)**

The undersigned hereby certifies that, as of April 23, 2024, the undersigned has received no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay.

The undersigned further certifies that I have reviewed the Court's docket in this case and no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay. Pursuant to the Notice of Motion, objections to the Movant's Motion were to be filed and served before April 12, 2024.

It is hereby respectfully requested that the Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: April 24, 2024

Respectfully submitted,

Brock & Scott, PLLC

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

BROCK & SCOTT, PLLC

3825 Forrestgate Drive

Winston Salem, NC 27103

Telephone: (844) 856-6646

Facsimile: (704) 369-0760

E-Mail: PABKR@brockandscott.com

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA (Reading)**

In Re: :
HECTOR DIAZ, : **Bankruptcy No. 23-10803-pmm**
Debtor : **Chapter 13**
Freedom Mortgage Corporation :
Movant :
 :
 :
v. :
HECTOR DIAZ : **11 U.S.C. §362**

and
SCOTT F. WATERMAN (Chapter 13), ESQUIRE
(TRUSTEE)

Respondent(s) :

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Certification of No Answer has been electronically served or mailed, postage prepaid on April 25, 2024 to the following:

HECTOR DIAZ
58 Second Street
Shillington, PA 19607

MICHAEL D. HESS, Debtor's Attorney
1672 Manheim Pike
Lancaster, PA 17601-3028
kortiz739@yahoo.com

SCOTT F. WATERMAN (Chapter 13), Bankruptcy Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606
ECFMail@ReadingCh13.com

Office of United States Trustee, US Trustee
Robert N.C. Nix Federal Building
900 Market Street, Suite 320
Philadelphia, PA 19107

/s/Andrew Spivack
Andrew Spivack, PA Bar No. 84439
Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

BROCK & SCOTT, PLLC

3825 Forrestgate Drive

Winston Salem, NC 27103

Telephone: (844) 856-6646

Facsimile: (704) 369-0760

E-Mail: PABKR@brockandscott.com